

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANTHONY DALE, BRETT JACKSON,  
JOHNNA FOX, BENJAMIN  
BORROWMAN, ANN LAMBERT,  
ROBERT ANDERSON, and CHAD  
HOHENBERY on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

DEUTSCHE TELEKOM AG, and T-  
MOBILE US, INC.,

Defendants.

Case No. 1:22-cv-03189

Hon. Thomas M. Durkin

Hon. Jeffrey Cole

**JOINT STATUS REPORT**

Pursuant to this Court's ruling and guidance during the February 6, 2024 Status Conference, Plaintiffs and Defendant T-Mobile US, Inc. ("T-Mobile" and, together, "the parties") respectfully submit this Joint Status Report. The parties exchanged correspondence and competing schedules on Tuesday, February 6, 2024, Wednesday, February 7, 2024, and Friday, February 9, 2024, and met and conferred telephonically on February 9, 2024. The parties now propose the following agreed schedule for combined class and merits expert discovery.

<b>Date</b>	<b>Deadline</b>
January 15, 2026	Deadline to Serve Opening Experts Reports on Class and Merits Issues for Which a Party Bears the Burden of Proof
March 26, 2026	Opposing Expert Reports
June 4, 2026	Rebuttal Expert Reports
July 16, 2026	Deadline to Complete Expert Depositions

The parties respectfully request that the Court enter the foregoing schedule. The parties will make themselves available to discuss further should the Court have any questions.

Dated: February 9, 2024

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/s/ Rachel S. Brass [with permission]

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**CERTIFICATE OF SERVICE**

I, Gary I. Smith, Jr., hereby certify that the foregoing Joint Status Report was electronically filed on February 9, 2024, and will be served electronically via the Court's ECF Notice System upon the registered parties of record.

/s/ Gary I. Smith, Jr.  
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*Interim Co-Lead Counsel for Plaintiffs and  
the Proposed Class*